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FILED

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Clerk, U.S. District Court
Northern District of California
San Jose

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15 Attorneys for Defendant
16 RAMESH "SUNNY" BALWANI

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN JOSE DIVISION

20 UNITED STATES OF AMERICA,
21
22 Plaintiff,
23
24 v.
25 HOLMES, et al.,
26
27 Defendants.

Case No. 18-CR-00258-EJD

**SUPPLEMENTAL DECLARATION OF
JEFFREY B. COOPERSMITH IN
SUPPORT OF DEFENDANT RAMESH
"SUNNY" BALWANI'S REPLY IN
SUPPORT OF MOTION TO SEVER**

Judge: Honorable Edward J. Davila

PROVISIONALLY FILED UNDER SEAL
PURSUANT TO COURT ORDER OF
JANUARY 13, 2020

DECLARATION OF JEFFREY B. COOPERSMITH

I, Jeffrey B. Coopersmith, declare as follows:

1. I am lead counsel for defendant Ramesh "Sunny" Balwani in this case, an attorney admitted to practice in the State of California, and a partner at Orrick, Herrington & Sutcliffe LLP, counsel of record for Mr. Balwani. I submit this declaration in support of Mr. Balwani's reply memorandum in support of Motion to Sever and Administrative Motion to Seal. I have personal knowledge of the facts stated herein, and I could and would testify competently to those facts if called as a witness.

2. Acting under my direction, members of Orrick, Herrington & Sutcliffe's research department searched U.S. news outlets and major wire services for stories since December 3, 2019, mentioning the fraud allegations against Mr. Balwani and Ms. Holmes. The search returned more than a dozen stories, plus dozens of blog posts and stories in international publications.

I declare under penalty of perjury that the foregoing is true and correct.

Executed February 7, 2020 at Seattle, Washington.

Dated: February 7, 2020


JEFFREY B. COOPERSMITH